

**REMARKS**

This Response, submitted in reply to the Office Action dated May 18, 2005, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Claims 1-43 are all the claims pending in the application.

**I. Information Disclosure Statement**

The Examiner asserts that the “Microsoft PowerPoint presentation presenting how to use Primis Online” on the PTO-1449 filed June 25, 2004 has not been considered because the Examiner cannot find any verifiable date on the form and within the reference.

As previously indicated, Applicant has no further information about this article as it was supplied by an examiner in one of the co-pending cases (09/489,576). The Applicant has also raised the issue of the date with the Examiner for co-pending application 09/489,576, however, the Examiner for application 09/489,576 continues to apply the Power Point presentation in the co-pending application. Therefore, Applicant respectfully requests that the Examiner consider the Microsoft PowerPoint presentation reference and indicate such consideration by initialing the PTO-1449 form.

**II. Rejection of claims 1-27 and 40-43 under 35 U.S.C. § 103**

Claims 1-27 and 40-43 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over ezWriter 2.0 for Windows (hereinafter ezWriter) in view of Bromberg et al. (U.S. Patent No. 6,529,889).

**Claim 1**

The Examiner continues to assert that the combination of ezWriter with Bromberg teaches the elements of claim 1. However, the Examiner has not addressed Applicant's argument that, assuming *arguendo*, the combination of Bromberg with ezWriter meets all the limitations of the claim, it would not have been obvious to combine the references as the Examiner asserts.

In particular, there is no reason why the child containers of Bromberg, which contain questions to be answered by an expert, would be combined with the .rtf files of ezWriter (i.e. "A Parent Entity," "A Child of that Entity," and "Another Child of that Entity").

Bromberg discloses containers of information regarding topics to be stored in a knowledge database and respective questions to be asked of an expert. The questions and answers are stored in the knowledge database according to topic. The Examiner continues to assert that it would be obvious to combine the parent container (topics) and child containers (questions) of Bromberg with the .rtf word processing files of ezWriter. However, there is no teaching or suggestion that ezWriter should be modified to include the organization of parent containers (regarding topics of discussion), and child containers containing (questions to be asked regarding a particular topic). Bromberg teaches such an organization so as to cure deficiencies in the prior art where irrelevant questions were asked of a user on particular topics. See Bromberg col. 1, line 57 to col. 2, lines 5. ezWriter does not suffer from this problem.

Although ezWriter (page 8) discloses “A Parent Entity,” “A Child of that Entity,” and “Another Child of that Entity,” this aspect of ezWriter was cited by the Examiner for teaching “a plurality of hierarchically related content entities of a content object.” See page 3 of Office Action. There is no teaching or suggestion in the prior art that the hierarchically related content entities of ezWriter should use a parent container and a child container. Further, there is no teaching or suggestion in the prior art that a parent container contain a child container or that the child containers can contain content entities (i.e. “A Parent Entity,” “A Child of that Entity,” and “Another Child of that Entity” as cited by the Examiner), as required by the claim.

Also, modifying ezWriter to use Bromberg’s parent and child containers in place of the .rtf files disclosed in ezWriter would destroy the principle operation of ezWriter, and hence, would not have been an obvious modification to a person of ordinary skill at the time of the invention. See MPEP 2143.01 “The Proposed Modification Cannot Change the Principle of Operation of a Reference.” ezWriter, in keeping with its stated goal of providing a “streamlined environment developed especially for writers,” uses only a sequence of periods preceding the entries in the ezWriter file to indicate the relationships between those entries such that “to create a child entry of another entry, just add it beneath the particular entry with one extra period.” See ezWriter p. 8. It is respectfully submitted that ezWriter does not teach or even suggest the use of containers, much less that a parent container can contain a child container, as required by claim 1 for example. To modify ezWriter to abandon its use of the sequence of periods in front of the entries in the .ezw file and instead use parent and child containers in which a parent container can contain a child container, would fundamentally change the principle of operation of how

ezWriter represents relationships among entities. Accordingly, it would not have been obvious to modify ezWriter to replace its technique of using a sequence of periods to represent relationships with the parent/child containers of Bromberg.

The Examiner continues to assert that the rollup feature would allow ezWriter to make set wide edits, therefore editing related chapters accordingly. However, the prior art neither teaches nor suggests such a motivation. Although the rollup feature may allow ezWriter to make set wide edits, there is no teaching or suggestion in ezWriter for such a modification, particularly since ezWriter automatically saves documents after edits. Modifying ezWriter to contain the rollup feature of Bromberg would clearly result in a substantial modification of the principle of operation of ezWriter, and would introduce a level of complexity that is contradictory to its goal of providing “a streamlined environment.” See ezWriter under the heading “What’s so cool about ezWriter?”. This evidences that the Examiner’s reasoning is merely a result of impermissible hindsight. Accordingly, it is respectfully submitted that there is no teaching or suggestion in the prior art to make the asserted combination.

For at least the above reasons, it is respectfully submitted that the combination of ezWriter and Bromberg would not have been obvious. Therefore, claims 1, 4, 8, 11, 15, 18 and their dependent claims should be deemed patentable.

**Claim 40 and 42**

The Examiner has not addressed Applicant’s arguments with respect to claims 40 and 42. As previously indicated, claim 40 recites that “moving a content entity identifier in the first list

to a new location comprises: selecting the content entity identifier from the first list of content entity identifiers to be moved; and specifying a location from a second list of content entity identifiers where the content entity identifier from the first list of content entity identifiers is to be moved; wherein the specified location comprises at least one of a current content entity identifier or a newly created content entity identifier” which is not recited in claim 1. Consequently, the Examiner’s assertion for the rejection of claim 1 are not applicable to all the elements of claim 40.

In particular, there is no teaching or suggestion in the combination of ezWriter and Bromberg of “a second list of content entity identifiers.” ezWriter discloses a single list of content entity identifiers. See for example page 8. The order of the content entities within the list of content entity identifiers is modified by the addition or removal of periods. At no point is the movement of a content entity identifier performed by “specifying a location from *a second list of content entity identifiers* where the content entity identifier from the first list of content entity identifiers is to be moved,” as required by claim 40.

Moreover, there is no teaching or suggestion that a location of a second list of content entity identifiers comprises a current content entity identifier or a newly created content entity identifier as required by claim 40. Further, any suggestion by the Examiner to modify ezWriter to include the elements of claim 41 would clearly be a result of impermissible hindsight.

For at least the above reasons, claim 40 and its dependent claim should be deemed allowable. To the extent claim 42 recites similar subject matter, claim 42 and its dependent claim should be deemed allowable for the same reasons.

**III. Rejection of claims 28-39 under 35 U.S.C. § 103**

Claims 28-39 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over ezWriter and Bromberg and further in view of Poole et al. (U.S. Patent No. 6,006,242). Claims 28-39 should be deemed patentable by virtue of their dependency to independent claims 1, 4, 8, 11, 15, and 18 for at least the reasons set forth above and because Poole does not satisfy the deficiencies of ezWriter and Bromberg.

**IV. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

RESPONSE UNDER 37 C.F.R. § 1.116  
Appln. No.: 09/488,971

Attorney Docket No.: A8519

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

  
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WASHINGTON OFFICE  
23373  
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Date: July 18, 2005